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10 Attorneys for Plaintiff

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12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 J.P., by and through his Guardian
15 Ad Litem, SHANNON VILLANUEVA

16 Plaintiff,
v.

17 COUNTY OF ALAMEDA, DIANE DAVIS
18 MAAS, SUE MAY, TRIAD FAMILY
SERVICES, MARIA REFUGIO MOORE,
19 and DOES 1-30, inclusive.

20 Defendants.

21 Case No: 4:17-cv-05679-YGR

22
23 **STIPULATION AND PROPOSED ORDER
TO EXTEND DEADLINES FOR
PLAINTIFF J.P. AND DEFENDANT TRIAD
FAMILY SERVICES RELATING TO
TRIAD'S FIRST SUMMARY-JUDGMENT
MOTION**

24 Date: June 18, 2019
Time: 2:00 p.m.
Courtroom: 1, 4th Floor, 1301 Clay Street,
Oakland, CA
Judge: The Hon. Yvonne Gonzalez Rogers

25 Complaint Filed: October 2, 2017
26 Trial Date: TBD

Defendant TRIAD FAMILY SERVICES (“TRIAD”) and plaintiff J.P., by and through their respective counsel, hereby stipulate as follows:

Whereas, TRIAD filed a motion for summary judgment on April 12, 2019 (Dkt.117) and this Court set a deadline for plaintiff J.P. to oppose this motion by April 23, 2019 and TRIAD to reply by April 30, 2019 with a hearing set on June 18, 2019;

Whereas the parties continue to meet and confer regarding the documents and deposition testimony which may be deemed confidential as defined by the Stipulated Protective Order filed on March 16, 2018 (Dkt. 51) or otherwise by privileged under Welfare & Institutions Code §827;

Whereas this process is a necessary step in determining whether J.P. would be required to file an Administrative Motion to Seal, under Local Rule 79-5;

Whereas, if an Administrative Motion to Seal, under Local Rule 79-5 is deemed to be necessary, J.P. will likely not have sufficient time to obtain a ruling on an Administrative Motion to Seal and still file its Opposition to Triad's Motion for Summary Judgment by April 23, 2019;

IT IS THEREFORE STIPULATED, pursuant to Rules 7-12 of the Civil Local Rules of the United States District Court for the Northern District of California that:

- 1) The last day for plaintiff J.P. to file his opposition to TRIAD's motion for summary judgment is extended from April 23, 2019 to May 17, 2019; and,
- 2) The last day for TRIAD to file his reply is extended from April 30, 2019 to May 24, 2019.

Dated: April 15, 2019

MATHENY SEARS LINKERT & JAIME LLP

By: /s/Ronald E. Enabnit
Ronald E. Enabnit, ESQ.
Attorneys for Defendant TRIAD FAMILY
SERVICES

1 Dated: April 15, 2019

SCOTT LAW FIRM

3 By: /s/ Lizabeth N. de Vries
4 Lizabeth N. de Vries, ESQ.
5 Attorneys for Plaintiff J.P.

6 PURSUANT TO STIPULATION, IT IS SO ORDERED.

7 DATED: April 18, 2019

8 
9 YVONNE GONZALEZ ROGERS
10 UNITED STATES DISTRICT JUDGE

11 SCOTT LAW FIRM
12 1388 SUTTER STREET, SUITE 715
13 SAN FRANCISCO, CA 94109